

KPS CONSULTING

“Building an Access Bridge in Technology and Telecommunications”

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January 23, 2008

By electronic filing:

Marlene Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: **Ex Parte Presentation**

CG Docket No. 03-123

Dear Ms. Dortch:

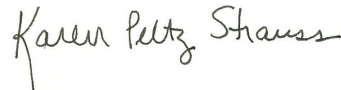
On January 22, 2008, Karen Peltz Strauss of KPSConsulting met with Cathy Seidel, Nicole McGinnis and Mike Jacobs of the Consumer and Governmental Affairs Bureau to discuss the following matters:

- Emergency call handling proceeding for video relay service (VRS) and Internet Protocol (IP) relay providers – On this issue, Ms. Strauss noted the immediate need to release an order that would require these relay providers to begin handling incoming calls involving emergency situations. Also emphasized was the importance of ensuring that this order sets a timeline for the implementation of uniform numbering for IP relay and VRS users (per comments recently filed by Telecommunications for the Deaf, Inc.). All discussion points have previously been made and are already on the record.
- FCC's certification process – Clarification was requested about the qualifications for receiving FCC certification to provide and receive compensation for IP relay and VRS. Ms. Strauss asked whether FCC rules require certified applicants to themselves have facilities, interpreters, etc. to operate relay services, or whether it is sufficient to simply market these services on behalf of other providers.

- Reimbursement for IP relay providers – Clarification was requested about the qualifications needed to receive reimbursement for any IP-based relay service. The point was made that under Section 225 of the Communications Act and FCC rules, it is sufficient to be an interstate common carrier to receive compensation from the Interstate Relay Fund, and that so long as one holds such status, it is not necessary to also receive federal certification or be providing this service pursuant to a contract with a state relay program.

Ms. Strauss also met with Scott Deutchman of the office of Commissioner Copps and Scott Bergmann of the office of Commissioner Adelstein to discuss the release of the above-mentioned IP relay/VRS emergency order, the release of a pending order modifying hearing aid compatibility requirements for wireless service providers and manufacturers, the need for FCC review of issues concerning the provision of real-time text in an Internet-enabled environment, and more generally, the contents of the 21st Century Communications and Video Programming Accessibility Act.

Sincerely,

A handwritten signature in cursive script that reads "Karen Peltz Strauss".

Karen Peltz Strauss